

Abbot Stevenson - coal fine drag-out issues

From: Kimbra Reinbold
To: dbartsch@coalsource.com
Date: Tue, May 20, 2008 10:50 AM
Subject: coal fine drag-out issues
CC: Abbot Stevenson; fblumling@coalsource.com

Hi Mr. Bartsch!

I have been in contact with Abbot Stevenson w/ DAPC, SEDO, and she provided me a copy of DSW's 4/14/08 letter from that division's 3/5/08 sampling inspection. She specifically directed me to Item 8 regarding the drag-out of coal fines onto SR 148, and recommended that I stop by the facility to determine if this issue is a violation of Ohio's air rules.

On 5/13/08, I was in the area and spent about 15 minutes near the intersection of SR 148 and TR 86. The public roadways themselves were relatively clean, and I did not see any problems with excess dust emissions from the traffic on the plant and clean coal area haul roads within the facility as they appeared to have been recently watered. However, I did notice a considerable buildup of coal fines 8-10" high along the berm of the road near the SE corner of the two public roads extending about 20 yards or so.

While it may be questionable whether the buildup of coal dust in the berms of the public roadway is an actual violation of OAC rule 3745-17-08(B)(9) (which requires prompt removal of material from paved streets), it appears that the sweeping that is being done is not actually removing the coal dust, but instead just pushing it aside. Given the large volume of heavy truck traffic on this section of SR 148, it is likely that the coal fines piled in the berms will also be blown around and redeposited onto the public roadway, defeating the purpose of sweeping.

To resolve this issue, please instruct OVCC staff to remove the coal fines from the road berms outside of the facility when sweeping. Further, I recommend that the company investigate a means to actually remove the coal fines that are removed from SR 148.

Please let me know what the company plans to do to resolve this issue.

Thanks!

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